28/660 and 2014-43-0 28/661



Jeremy C. Hodges (Admitted in SC & WV) T 803.255.9766 F 803.255.9164 jeremy.hodges@nelsonmullins.com NELSON MULLINS RILEY & SCARBOROUGH LLP ATTORNEYS AND COUNSELORS AT LAW

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February 1, 2019

Via Electronic Filing

The Hon. Jocelyn Boyd Chief Clerk and Administrator SC Public Service Commission Post Office Drawer 11649 Columbia, SC 29211

RE:

2018 Lifeline Re-Certification Report

TracFone Wireless Inc./ SafeLink Wireless Inc.

Our File: 34395/01500 Docket No.: 2019-14-C

Dear Ms. Boyd:

Enclosed for filing in the above referenced docket is the Annual Lifeline Eligible Telecommunications Carrier Certification Form on behalf of TracFone Wireless, Inc. d/b/a SafeLink Wireless, INc that has been FCC and USAC. If you have any questions or concerns regarding these matters, please do not hesitate to contact me.

Very truly yours

Jeremy C. Hodges

Enclosures

CC:

Jeffrey M. Nelson (all via e-mail / .pdf)

Becky Dover

Carri Grube - Lybarker

RECEIVED

EER 0 1 2019

PSC SC CLERK'S OFFICE Annual Lifeline Eligible Telecommunications Carrier Certification Form All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

249012		143030103
Study Area Code (SAC An Eligible Telecommunicat	•	Service Provider Identification Number (SPIN) certification form for each SAC through which it provides Lifeline service).
2018	SC	TracFone Wireless Inc
Recertification Year	State	ETC Name
SafeLink Wireless		TracFone Wireless Inc
DBA, Marketing, or Oti If same as ETC name. list "N	her Branding Name 'A" Do <u>not</u> leave blank)	Holding Company Name (If same as ETC name, list "N/A" Do not leave blank)
If same as ETC name, list "N	(A" Do <u>not</u> leave blank)	(If same as ETC name, list "N/A" Do not leave blank)
If same as ETC name, list "Note that reporting comparide a list of all ETCs that are mined in accordance with Se	A" Do <u>not</u> leave blank) Iny have affiliated ETCs? In affiliated with the reporting ETC, ection 3(2) of the Communications	
s the reporting compa ide a list of all ETCs that are mined in accordance with So s or controls, is owned or con	A" Do <u>not</u> leave blank) Iny have affiliated ETCs? In affiliated with the reporting ETC, ection 3(2) of the Communications	(If same as ETC name, list "N/A" Do not leave blank) Yes No verified the list "N/A" Do not leave blank) Yes No Act. That Section defines "affiliate" as "a person that (directly or indirectly)

ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements?

Yes 🔘

No 🖸

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	1772
February	1954
March	1932
April	. 2304
May	1871
June	1492
July	1350
August	1183
September	988
October	980
November	934
December	1211
Total Subscribers	17971

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Initial Certification All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

	JR	
Initial		

Minimum Service Level

I certify that the company listed above is in compliance with the minimum service levels set forth in the 47 CFR Section 54.408.

I am an officer of the company named above. I am authorized to make this certification for the SACs listed above.

Initial JR

Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

Report the number of Lifeline subscribers due for recertification by month (January-December)

- A. Subscribers eligible for recertification by anniversary month
- B. Subscribers de-enrolled prior to recertification attempts
- C. Total number of subscribers ETC is responsible for recertifying (A-B)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
A.	3607	3402	3365	4590	6976	5858	3926	4120	2896	2651	1756	2030	45177
В.	610	411	431	675	1098	1427	535	702	423	363	235	335	7245
C.	2997	2991	2934	3915	5878	4431	3391	3418	2473	2288	1521	1695	37932

Recertification Methods

State of federal database

D. Subscribers recertified through ETC access to state or federal database by anniversary month

Report the number of eligible subscribers verified through access to a state or federal database.

	Jan_	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
D.	89	131	117	2	39	64	60	85	47	54	33	147	868

E. Name of the data source(s) used to verify consumer eligibility:

MEDICAID

ETC Direct Contact

F. Subscribers contacted by ETC directly to recertify (You may also use this section to report subscriber initiated recertifications).

Report the number of Lifeline subscribers the ETC contacted directly to obtain recertification of eligibility

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
F.	2908	2860	2817	3913	5839	4367	3331	3333	2426	2234	1488	1548	37064

G. Subscribers who failed to recertify through ETC direct outreach attempt

Report the number of Lifeline subscribers de-enrolled due to ineligibility or non-response to the ETC's outreach attempt

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
G.	2160	2120	1798	2535	2969	2357	1621	1894	1141	1069	624	473	20761

H. Subscribers who recertified through ETC direct outreach attempt

Report the number of Lifeline subscribers that successfully recertified through ETC's outreach attempt.

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
I	I.	748	740	1019	1378	2870	2010	1710	1439	1285	1165	864	1075	16303

Third Party

I. Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC

Report the number of Lifeline subscribers contacted by a state administrator, third party administrator, or USAC for the purpose of recertification.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
I.	0	0	0	0	0	0	0	0	0	0	0	0	0

J. Name of third party administrator used to verify subscriber eligibility:

K. Subscribers de-enrolled as a result of a third party recertification attempt

Report the number of subscribers as a result of ineligibility or non-response to outreach from a state administrator, third party administrator, or USAC.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
K.	0	0	0	0	0	0	0	0	0	0	0	0	0

L. Subscribers who recertified through a state administrator, third party administrator, or USAC's recertification effort

Report the number of subscribers that recertified through a request from a state administrator, third party administrator, or USAC

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
L.	0	0	0	0	0	0	0	0	0	0	0	0	0

Certification:

Recertification Method: Database

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on a database. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

JR	
	JR

Recertification Method: ETC

I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial	JR
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Recertification Method: Third Party

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on an administrator. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial	

No Subscribers

I certify that my company did not claim federal low income support for any Lifeline subscribers for the current Form 555 data year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

M = (G+K)	N = (D+F+I)	O = M/N*100
Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
20761	37932	54.73%

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Javier Rosado - Sr. Officer, Business I

Signature of Officer

irosado@tracfone.com

Email Address of Officer

Janet Morejon

Person Completing This Certification Form

Javier Rosado - Sr. Officer, Busil

Printed Name and Title of Officer

Jan 29, 2019

Date

305-715-6522

Contact Phone Number

Affiliated ETCs

SAC Name	
]	
<u> </u>	

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

IN RE:) Docket No. 2019-14-C
Request for Certification of the Use of Universal Service Funds Pursuant to 47 C.F.R. 54. 314 and)))) CERTIFICATE OF SERVICE
Telecommunications Act Section 254(e), Federal Communications Commission CC Docket NO. 96-54)))
(2019) and Annual Reports for ETC))

I hereby certify that on February 1, 2019, I served one copy of a 2018 Annual Lifeline Eligible ETC Certification Form on behalf of SafeLink Wireless by electronic mail to the following individuals:

Jeffrey M. Nelson jnelson@ors.sc.gov Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Becky Dover bdover@scconsumer.gov SC Dept. of Consumer Affairs

Carrie Grube – Lybarker clybarker@scconsumer.gov SC Dept. of Consumer Affairs.

s/ Jeremy C. Hodges

Columbia, South Carolina February 1, 2019